### **REMARKS**

Claims 1-29 were presented for examination and all claims were rejected. Currently, claims 1-29 are pending, of which claims 1, 10, 14, 20 and 21 are independent. Applicants submit that claims 1-29 are patentable and in condition for allowance.

The following comments address all stated grounds of rejection. Applicants respectfully traverse all rejections and urge the Examiner to pass the claims to allowance in view of the remarks set forth below.

#### CLAIM REJECTIONS UNDER 35 U.S.C. §103

# I. Claims 1-9, 13-19, and 21-29 Rejected under 35 U.S.C. §103(a)

Claims 1-9, 13-19, and 21-29 were rejected as unpatentable over U.S. Patent Number 5,781,720 to Parker et al. ("Parker") in view of U.S. Patent No. 7,085,755 to Bluhm et al. ("Bluhm") and further in view of U.S. Patent Number 7,203,941 to Demsey et al. ("Demsey"). Claims 10-12 and 20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Parker in view of Bluhm. Claims 1, 10, 14, 20 and 21 are independent. Applicants respectfully traverse this rejection and submit that Parker, Bluhm and Demsey, alone or in combination, fail to teach or suggest each and every feature of the claimed invention.

### A. Independent Claims 1, 14, and 21 Patentable over Parker, Bluhm and Demsey

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. Independent claims 1, 10, 20 and 21 are directed towards methods of virtualizing access to windows and independent claim 14 is directed towards an apparatus for virtualizing access to windows. These methods and apparatus recite a process executing within the context of an isolation scope. The isolation scope is provided by an isolation environment, which comprises a user isolation layer and an application isolation layer.

The combination of Parker, Bluhm, and Demsey fails to teach or suggest each and every feature of the claimed invention. In the Office Action, the Examiner admits that Parker does not teach or suggest receiving a request within the context of a user isolation scope, wherein the user isolation scope is provided by an isolation environment comprising a user isolation layer and an application isolation layer.

Bluhm also fails to teach or suggest receiving a request within the context of a user isolation scope. Bluhm describes merely a system for maintaining a large aggregation of Page 2 of 5

electronically stored documents and making them available to users that submit inquiry messages (see Bluhm, col. 2, lines 14-17). In the Office Action, the Examiner equates the user isolation scope to Bluhm's mechanism for providing users differentiated information resource services based on shared access to multiple data collections. However, Bluhm does not teach a user isolation scope provided by a user isolation layer. Rather, Bluhm merely teaches a system where multiple users can access a data repository through requests. The requests from the users may all access the same resources and thus does not provides any user isolation. Therefore, Bluhm is silent with regards to a user isolation scope provided by a user isolation layer.

Furthermore, even if one were to argue that Bluhm does teach a user isolation layer, neither Parker nor Bluhm describe an application isolation layer. The Examiner admits in the Office Action that Parker does not teach or suggest an application isolation layer. Bluhm is silent with regards to an isolation environment comprising a user isolation layer and an application isolation layer. Thus, Parker and Bluhm, alone or in combination, fail to teach or suggest each and every element of the claimed invention.

Similarly, Demsey also does not teach or suggest an isolation environment comprising a user isolation layer and an application isolation layer. Demsey merely describes a tracking system for native resources (*see* Demsey, Summary). Demsey is also silent with regards to an isolation environment comprising a user isolation layer and an application isolation layer. Therefore, Demsey also fails to teach or suggest each and every element of the claimed invention.

Accordingly, Parker, Bluhm and Demsey, alone or in combination, fail to teach or suggest each and every limitation of the independent claims 1, 14, and 21, Applicants respectfully submit that independent claims 1, 14, and 21 are patentable and in condition for allowance. Claims 2-9 depend on and incorporate all of the patentable subject matter of claim 1, claims 13 depends on and incorporates all of the patentable subject matter of claim 10, claims 15-19 depend on and incorporate all of the patentable subject matter of claim 14 and claims 22-29 depend on and incorporate all of the patentable subject matter of claim 21. Thus, Applicants submit that dependent claims 2-9, 13, 15-19, and 22-29 are also patentable and in condition for allowance. Applicants submit that the rejection of claims 1-9, 13-19, and 21-29 under 35 U.S.C. §103 has been overcome and respectfully request the Examiner to withdraw the rejection.

# B. Independent Claims 10 and 20 Patentable over Parker and Bluhm

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. Independent claims 10 and 20 are directed towards methods of virtualizing access to windows. These methods recite a process executing within the context of an isolation scope. The isolation scope is provided by an isolation environment, which comprises a user isolation layer and an application isolation layer.

Claims 10 and 20 are independent claims. Claims 11 and 12 depend on and incorporate all of the patentable subject matter of independent claim 10. The arguments made immediately above with respect to Parker and Bluhm apply with equal force here and are reiterated as if set forth in full.

Since Parker and Bluhm, alone or in combination, fail to teach or suggest each and every feature of the claimed invention, Applicants submit that independent claims 10 and 20 are patentable and in condition for allowance. Claims 11-12 depend on and incorporate all of the patentable subject matter of claim 10. Thus, Applicants submit that dependent claims 11 and 12 are also patentable and in condition for allowance. Accordingly, Applicants submit that the rejection of claims 10-12 and 20 under 35 U.S.C. §103(a) has been overcome and respectfully request the Examiner to withdraw the rejection.

### **CONCLUSION**

In light of the aforementioned arguments, Applicants contend that each of the Examiner's rejections has been adequately addressed and all of the pending claims are in condition for allowance. Accordingly, Applicants respectfully request reconsideration, withdrawal of all grounds of rejection, and allowance of all of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' attorney would expedite prosecution of this application, the Examiner is urged to contact the Applicants' attorney at the telephone number identified below.

Respectfully submitted,

CHOATE, HALL & STEWART, LLP

Dated: August 16, 2010 / John D. Lanza /

John D. Lanza Reg. No. 40,060 Attorney for Applicants

Two International Place Boston, MA 02110

Phone: (617) 248-5000 Fax: (617) 502-5002